

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DAMON ATKINS, Plaintiff, v. CITY OF READING, et al., Defendants.	C.A. No. 5:23-CV-02732-JMG
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ADEN RUSFELDT, Plaintiff, v. CITY OF READING, et al., Defendants.	C.A. No. 5:23-CV-01523-JMG
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**MOTION FOR LEAVE TO FILE REPLY BY DAMON ATKINS, ADEN RUSFELDT,
AND CORNERSTONE LAW FIRM, LLC**

In the Brief in Opposition filed by Defendants at ECF No. 23, Defendants misconstrue our request, distort the law, and ignore controlling authority by the U.S. Court of Appeals for the Third Circuit. A short Reply, submitted as Exhibit A herein, is necessary to respond to the arguments raised by Defendants and movants request leave from the Court to file the same.

WHEREFORE, based on the forgoing, the Court should grant this Motion and permit the Reply Brief, attached as Exhibit A, to be filed on the docket and to be considered with the Motion for Relief from Protective Order.

Respectfully submitted,

CORNERSTONE LAW FIRM, LLC

Dated: May 20, 2024

By: /s/ Joel A. Ready
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